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[Additional counsel and complete
signature blocks listed on signature page]

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

IN RE CCIV / LUCID MOTORS
SECURITIES LITIGATION

Lead Case No. 4:21-cv-09323-YGR

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINES
FOR MOTION TO AMEND BRIEFING**

Pursuant to Civil L.R. 6-1(b) and 6-2, Co-Lead Plaintiffs Paradigm Business Park, LLC and Sichao Xu, along with Max Royal LLC, Seung R. Lee, Hee K. Lee, and Aaron Lan (together, “Plaintiffs”) and Defendants Atieva, Inc. and Peter Rawlinson, (“Defendants” and together with Plaintiffs, the “Parties”) respectfully submit, subject to the Court’s approval, the following Stipulation and [Proposed] Order Extending Deadlines for Motion to Amend Briefing.

STIPULATION

WHEREAS, on January 11, 2023, the Court entered an order dismissing the Revised Amended Complaint in the Class Action (Dkt. No. 151) and granting Plaintiffs until January 30, 2023 to move for leave to further amend the Revised Amended Complaint (the “Dismissal Order”);

WHEREAS, on January 30, 2023, Plaintiffs filed a 25-page Motion for Leave to Amend Complaint (the “Motion to Amend”) and a 96-page Proposed Second Amended Complaint (the “Proposed SAC”) (Dkt. Nos. 152, 152-1);

WHEREAS, on February 3, 2023, the Court entered an order granting the Parties’ stipulation to resetting the deadlines for the Motion to Amend Briefing.

WHEREAS, in light of the length and complexity of Plaintiffs’ Motion to Amend and Proposed SAC, the number of legal issues raised, and Plaintiffs’ counsels’ other case and scheduling commitments, the Parties agree that a modest one-week extension of the deadlines in which to file any reply to the Opposition to the Motion to Amend is warranted;

WHEREAS, there have been five prior time modifications in this case, the first two of which extended the deadlines to respond to the initial complaint pending resolution of the PSLRA’s mandatory lead plaintiff appointment process (Dkt. Nos. 13 & 27), the third and fourth of which extended the deadlines to file and respond to the Amended Complaint and established a briefing schedule for the motion to dismiss (Dkt. Nos. 107 & 109), and the fifth of which reset the original deadlines for the Motion to Amend Briefing; and

WHEREAS, the entry of this stipulation would cause only a modest delay in the schedule for briefing the Motion to Amend and does not alter any other deadlines set by the Court;

1 IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned attorneys
2 for the Parties and subject to the approval of the Court, as follows:

3 (1) Plaintiffs' time to file any reply in further support of the Motion to Amend shall be
4 extended until March 22, 2023.

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7 Dated: March 3, 2023

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8 By: /s/ Carol C. Villegas

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Attorneys for Defendants Atieva, Inc. and Peter Rawlinson

FILER'S ATTESTATION

Pursuant to Local Rule 5-1(h)(3), I, Jake Bissell-Linsk, attest that concurrence in filing this document has been obtained from the other signatories.

Dated: March 3, 2023

/s/ Jake Bissell-Linsk
Jake Bissell-Linsk

[PROPOSED] ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: _____

HONORABLE YVONNE GONZALEZ ROGERS
U.S. DISTRICT JUDGE